

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
ELKINS DIVISION**

**TERESA L. YONCE, as
Administratrix of the Estate
of Brock Bland,**

Plaintiff,

v.

Civil Action No. 2:21-cv-26 (Kleeh)

**BRP, Inc., a foreign profit corporation;
BOMBARDIER RECREATIONAL
PRODUCTS, Inc., a foreign profit corporation,
BRP US, Inc., a foreign profit corporation, and
PETE’S CYCLE COMPANY, INC.,
a Maryland corporation,**

Defendants.

**STIPULATION EXTENDING DEADLINE FOR DEFENDANT
PETE’S CYCLE COMPANY, INC. TO RESPOND TO COMPLAINT**

Pursuant to Rules 7.01 and 12.01 of the Local Rules of Civil Procedure for the U.S. District Court for the Northern District of West Virginia, it is hereby stipulated between Plaintiff Teresa L. Yonce, as Administratrix of the Estate of Brock Bland, and Defendant Pete’s Cycle Company, Inc. (“Pete’s Cycle”), by their respective counsel, as follows:

Service of the summons and Complaint upon Pete’s Cycle was made on January 5, 2022 pursuant to Rule 4(h) of the Federal Rules of Civil Procedure, and these parties stipulate that the deadline for Pete’s Cycle to serve its answer, pleading, motion or other response to the Complaint is extended up to and including February 18, 2022. These parties further stipulate and recognize that this Stipulation shall not operate to limit, waive or restrict Pete’s Cycle from asserting any and all defenses available to it, including, without limitation, a defense of lack of personal jurisdiction under Rule 12(b)(2) of the Federal Rules of Civil Procedure. These parties agree that this stipulated

extension of time to answer or otherwise respond to the Complaint will not prejudice any party nor unnecessarily delay this action.

Dated this 21st day of January, 2022.

/s/ Sharon F. Iskra - By Jeffrey Zurbuch, with permission
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CERTIFICATE OF SERVICE

I, Jeffrey S. Zurbuch, one of counsel for Pete’s Cycle Company, Inc., do hereby certify that on January 21, 2022, I electronically filed a *Stipulation Extending Deadline for Defendant Pete’s Cycle Company, Inc. to Respond to Complaint* with the Clerk of the Court using the CM/ECF system, which will send notification to the following counsel as CM/ECF participants: Eric B. Snyder, Esq., esnyder@baileyglasser.com, Sharon F. Iskra, Esq., siskra@baileyglasser.com, Richard D. Jones, Esq., rjones@flahertylegal.com, and Jason A. Proctor, Esq., jproctor@flahertylegal.com.

/s/ Jeffrey S. Zurbuch

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